

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

WALSH SECURITIES, INC.,	:	Civil Action No. CV 97-3496 (SDW)
	:	
Plaintiff,	:	Hon. Susan D. Wigenton
	:	
v.	:	
	:	
CRISTO PROPERTY MANAGEMENT,	:	STIPULATION AND ORDER
LTD., a/k/a G.J.L. LIMITED, et al.	:	FOR PARTIAL LIFT OF STAY
	:	TO CONDUCT DEPOSITIONS
Defendants.	:	

ORDER ON ORAL MOTION

STIPULATION

This Stipulation is entered into by and between Plaintiff Walsh Securities, Inc. ("WSI") and Defendants Commonwealth Land Title Insurance Co. ("Commonwealth"), Nations Title Insurance of New York, Inc. and Fidelity National Title Insurance Co. of New York, which entities have merged together since commencement of the action ("Nations/Fidelity"), and Coastal Title Insurance Co. ("Coastal").

WHEREAS, Pursuant to the Order of Magistrate Judge Arleo dated March 17, 2006 all remaining parties have been engaged in mediation to resolve this action, which has resulted in agreements in principal with certain parties except Commonwealth, Nations/Fidelity and Coastal; and

WHEREAS, because discovery in this action was stayed for several years during the pendency of criminal investigations of certain Defendants, the parties desire to conduct a limited number of depositions on limited topics for the purpose of furthering the mediation process;

NOW, THEREFORE, the undersigned parties hereby stipulate and agree as follows:

- a) Prior to the next mediation session scheduled for November 15, 2006, all remaining parties to the mediation may notice to take the depositions of the following nine (9) persons: William Kane, Gary Greiser, Lawrence Cuzzi, Roland Pierson, Thomas Brodo, James R. Brown, Richard Calanni, Anthony D'Appolito and Kellie O'Neill;
- b) The above-listed depositions shall be taken for the limited purpose of eliciting testimony concerning the alleged involvement of WSI and/or any of its officers, directors or shareholders in the real estate loan fraud which underlies this action; and
- c) All parties hereto reserve their respective rights to further depose these persons and any other persons concerning any topics relevant to this matter in the event that this matter is not resolved in mediation and proceeds to plenary discovery.

_____/S/_____
Robert A. Magnanini, Esq.
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Short Hills, NJ 07078
Counsel for Plaintiff Walsh Securities, Inc.

Dated: 8/10/06

_____/S/_____
David R. Kott, Esq.
McCarter & English
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Newark, NJ 07101
Counsel for Defendant Commonwealth Land Title Insurance Co.

Dated: 8/14/06

_____/S/_____
Edward Hayes, Esq.
Anthony Argiropoulos, Esq.
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Counsel for Defendants Nations Title Insurance of New York, Inc.
and Fidelity National Title Insurance Co. of New York

_____/S/_____
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Methfessel & Werbel
3 Ethel Road, Suite 300
Edison, NJ 08818
Counsel for Defendant Coastal Title Insurance Co.

ORDER

Based upon the foregoing Stipulation:

IT IS HEREBY ORDERED that the above Stipulation shall be, and hereby is,
adopted as the Order of this Court, and the parties are directed to fully comply therewith.

Dated: Aug 29, 2006



Madeline Cox Arleo, U.S.M.J.